

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JIM D. BOST, JR.
DEBTOR**

CHAPTER 7 CASE NO: 19-15092-JDW

**LIMITED RESPONSE OF GUARANTY BANK & TRUST COMPANY
TO TRUSTEE'S MOTION TO SELL PROPERTY FREE AND CLEAR
OF LIENS, INTEREST, ENCUMBRANCES AND CLAIMS
PURSUANT TO 11 U.S.C. §363(b) & (f) (DKT. #65)**

Guaranty Bank & Trust Company ("GB&T") a secured creditor in this case, for its Limited Response to the Trustee's Motion to Sell Property Free and Clear of Liens, Interest, Encumbrances and Claims Pursuant to 11 U.S.C. §363(b) & (f) (Dkt. #65) states as follows:

1. GB&T is a secured creditor and party-in-interest in this proceeding. GB&T has a first lien on the real property at issue in this motion. A true and correct copy of GB&T's deed of trust is attached hereto as Exhibit A and incorporated herein by reference.

2. GB&T does not objection to the sale, free and clear of liens, provided that any sale provide adequate protection to GB&T in the form of immediate payment of its lien in full at closing. As of July 23, 2020, the total payoff on the note secured by the deed of trust is \$78,055.58, with a per diem of \$14.1353.

WHEREFORE PREMISES CONSIDERED, GB&T respectfully requests that this Court condition the approval of this motion upon providing adequate protection to GB&T in the form of immediate payment in full of its lien at the closing of any sale of the property. GB&T also requests general relief.

Respectfully submitted this 23rd day of July, 2020

GUARANTY BANK & TRUST COMPANY

By: /s/ Jim F. Spencer, Jr.

Jim F. Spencer, Jr., One of its attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Jim F. Spencer, Jr., hereby certify that I have filed the foregoing document using the CM/ECF System which sent notice of the filing to all persons requesting notice and specifically to:

James W. Amos – jwamosattorney@aol.com

William L. Fava – wfava@favafirm.com

U.S. Trustee - USTPRegion05.AB.ECF@usdoj.gov

This 23rd day of July, 2020.

/s/ Jim F. Spencer, Jr.

Jim F. Spencer, Jr.